

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA)
Plaintiff)
)
v.)
)
JEUS ALBERTO URIBE LONDONO)
Defendant)
)
CRIMINAL NO. 00-092 JAF)

MOTION REQUESTING SANCTIONS AGAINST THE GOVERNMENT
AND THE APPOINTMENT OF A PUBLIC DEFENDER BY THE COURT

To the Honorable
Jose Antonio Fuste
Chief Judge
United States District Court
For the District of Puerto Rico

Comes now, Jesus Alberto Uribe, Pro-Se, and before the Honorable Court respectfully states and prays:

1. On July 18, 2007, the United States Court of Appeals for the First Circuit reversed the District Court's denial of Mr. Uribe's Rule 41(g) motion and remanded for further proceedings.
2. On October 4, 2007 the attorney Juan Alvarez Cobian, Esq. was appointed by the District Court to represent Mr. Uribe Londono on this matter.
3. Mr. Uribe Londono, after several months without any news from the appointed attorney nor the Court, wrote to the Court requesting to know the name, address and phone number of the appointed lawyer.
4. After learning that most of the property had been destroyed by the Government, and since no action had been taken by the appointed attorney, Mr. Uribe requested from him through several phone calls and letters to draft a Motion listing the items lost and requesting sanctions against the Government. Mr Uribe asked Mr. Alvarez Cobian to send him the draft of such Motion before filing it.
5. On February 28, 2008, the appointed attorney filed in Court an "Informative Motion" failing to send Mr. Uribe Londono the draft beforehand. As a result, the filed Motion is incomplete, not listing some of the most important items lost, and it is

merely "informative" and not asking for any sanctions against the Government.

6. Attachments 1, 2 show the personal property seized listed by the FBI.
7. Attachment 3 lists the personal property from the defendant's office that was not returned to him following the seizure of property from that office by the FBI.
8. As for the defendant's passport, in the Government's Motion of 17 July, 2006 to the District Court, the Government says says that it "delivered the defendant's passport to the Immigration Department at Taboanuco Street, Guayanabo, Puerto Rico. (See Pg 5)" The defendant requests to have it returned to him as it is his legal personal property.
9. As for the Defendant's computer hard drive and 5 CD's, the Government established in Page 10 of the FD-192 (Attachment 2) that it kept copies of the originals that were returned to the defendant's place of employment. The defendant is requesting these copies as they contain his only copy of research he collected over the past 20 years, intrinsic to his work to a client as an expert in the Utilization of Natural Resources, and Protection of the Environment. While this material is of substantial importance to the defendant, it is of little worth to the bank to which it was returned, which is only concerned in cleaning that computer of all the data to make it available to other employees.
10. In the February 28th, 2008 Motion in behalf of the defendant, Attorney Alvarez Cobian requested to withdraw from Mr. Uribe's legal representation.

WHEREFORE, the pro-se defendant respectfully requests that the Court order the Government to return all the seized property listed in the attachments, which was not proven to be related to the crime or its commission thereof, "to be sanctioned as basis or a bond for Mr. Uribe to be compensated for the damages that he suffered from the destruction of his personal property without court notification or authorization, valued at \$250,000.

Furthermore, the defendant prays that the Court allow the withdrawal of Attorney Alvarez Cobian, since he has not been effective, nor has he followed his directions and suggestions as to how to pursue this case, and the defendant respectfully requests to have a Public Defender appointed to represent him until this case is extinguished.

Respectfully submitted this 5 day of March, 2008

Jesus A. Uribe Londono
Pro Se Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this date a true and correct copy of the foregoing motion has been mailed to:

Maritza Gonzalez
Assistant United States Attorney
Torre Chardon, Suite 1201
Carlos Chardon Ave. #350
Hato Rey, PR 00918

March 7th, 2008

Jesus A. Uribe

Jesus A. Uribe-Londono

Pro Se Defendant